

Privacy Policy Statement

Our firm provides investment services by means of its own internal operation and unaffiliated third-party service and product providers (for example, your account custodian or a money manager) at your election. The account custodian processes the investment transactions for your account. This firm and the product and service providers receive and maintain information about you that is related to your account.

WHERE DO WE OBTAIN THE INFORMATION. The information that we have comes directly from you. This includes such information as your name, address and Social Security number that you provided on applications, agreements or other forms. In addition, we maintain records of each of your transactions and holdings at the product and service provider that are processed through this firm.

TO WHOM DO WE DISCLOSE THE INFORMATION. We provide information about current or former clients from the sources described above to parties outside of our firm only as described below:

To other companies as necessary to process your business. For example, we process your investment instructions through product and service providers with whom we have business agreements. The information that we obtained from you is given to the product and service providers for purposes of effecting transactions in your account and preparing your account statements. These parties must limit their use of the information to the purpose for which it was provided.

Where required by law or regulation. Examples include responses to a subpoena, court order or regulatory demand.

As authorized by you. You may direct us, for example, to send account statements or other account information to a third party.

As otherwise authorized or permitted by law. For example, the law permits us to respond to requests for information on you from a consumer-reporting agency.

CONFIDENTIALITY AND SECURITY. We restrict access to information about you to those employees and authorized agents who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards as outlined in the attached policy statement to maintain the confidentiality of your information.

We will continue to provide that same privacy of your information even if you cease being our customer, through the legally required record retention period until such records may be destroyed as permitted.